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July 19, 2016

BY ECF

The Honorable Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Ysmael Maldonado v. The City of New York, et al.*, No. 15-CV-06619

Dear Judge Bloom:

We are pro bono counsel for the Plaintiff in this action. We write to request an extension of the deadline for filing of the Amended Complaint from July 22, 2016 to August 19, 2016, in light of internal personnel changes. Opposing counsel has consented to the requested extension. There have been no previous requests for extension of this deadline.

Respectfully submitted,



Phillip Spinella

cc: All Counsel (via ECF)